

From: Bill Jacobs
To: anie lauzon
Subject: RE: Rodenticides
Date: 05/04/2010 04:09 PM

If you want more "helpful" information, I can provide some .pdfs of documents from our bait station project in the 1980's and 1990's. The issues now are largely the same as they were then, except that we focused primarily on "empty" bait stations and labels for rodenticide bait products.

▼ anie lauzon ---05/04/2010 03:28:36 PM---Thank you for the information, and prompt response. This is very helpful.

From: anie lauzon <anie.lauzon@hc-sc.gc.ca>
To: Bill Jacobs/DC/USEPA/US@EPA
Date: 05/04/2010 03:28 PM
Subject: RE: Rodenticides

Thank you for the information, and prompt response. This is very helpful.

Anie

From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]
Sent: May 4, 2010 3:09 PM
To: anie lauzon
Subject: RE: Rodenticides

They would have to test the stations. Some testing of the stations on the historical list was conducted at the manufacturers' initiatives. Typically, that occurred after I had informed them that I could not determine, via inspection, whether the unit complied with one or more of the 8 criteria for "tamper-resistant bait stations" indicated in PR Notice 94-7 or, before that, the criteria listed in PR Notice 83-5.

Testing of the stations sold empty was conducted in the unit-secured condition as those stations do not have bait put into them until they are put into use. The ready-to-use stations come with bait in them and, therefore, are tested in the unsecured condition. In a "perfect world", they would be tested both in the secured and unsecured conditions.

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Would the bait stations on this list be acceptable for packaging as ready-to-use bait stations under the 2008 decision, or would the registrant need to test them according to the protocols outlined in the Decision document?

From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]
Sent: May 4, 2010 2:02 PM
To: anie lauzon
Subject: Re: Rodenticides

The list pertains to bait stations that are sold without bait in them, rather than the ready-to-use bait stations with which the 2008 Rodenticide Risk Mitigation Decision primarily is concerned. If you wish, I can supply you with an historical copy of the list for empty bait stations and copies of several related documents.

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| |anie lauzon <anie.lauzon@hc-sc.gc.ca>
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Good afternoon,

The PMRA is currently working on requiring additional risk mitigation measures for rodenticides, similar to those required by the EPA in their 2008 Risk Mitigation Measures for Ten Rodenticides.

Bo Davis has mentioned that a list of acceptable bait stations for rodenticides. Would you be available to provide more information on that list? Would this list be available to the public?

Any information you can provide on this question would be appreciated.

Thank you for your assistance,

Anie Lauzon
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